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1 Sep 2003
U.S. Department of Transportation
Federal Aviation Administration
Docket management System
400 7th Street, SW
RM PL 401, Washington, DC 20591-0001

2003 Sep -2 A.D. 10

Subject: SFAR-71

Dear FAA Administration

When SFAR-71 was initiated there were a series of reasons.
Public safety needed to be addressed. Part 91&135 operators in Hawaii were not...
Providing adequate safety briefings...
Providing Life jackets on over water flights...
Providing adequate training of ground personnel...
Providing adequate training of pilot staff...
When the cost analysis was completed it was decided the expense was not excessive
(burden) on the Industry.

Since the SFAR-71 went into affect these safety concerns have been corrected.

There is this lingering issue regarding flight altitudes.
It is my professional opinion that this (fixed ruling approach) is not the real intent of the
SFAR-71. Pilots can't have real time decisions made for them by someone on the ground.
The concept is self defeating.....and generates mutual contempt. This short term solution
was necessary . The deviations are proof it is not a viable long term solution.


I am surprised at the possibility that the SFAR-71 COULD become a permanent fixed
ruling.

Is it acceptable to have fixed wing (single engine) aircraft flying lower than
helicopters....NO.

Is it acceptable to have helicopters forced to fly farther down slope because of forced
altitudes and ceilings...NO

The real intent is for a safer flying environment, the SFAR-71 is not the F.A.A.'s best
work. Please consider the wisdom of this advice.....don't make something temporary
permanent. Make a better effort...try a little harder...this easy option is unworthy.

Sincerely



Steve Wilcox